



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 600  
DENVER, COLORADO 80202-2466

JUL 18 1997

Ref: 8EPR-EP

**VIA FACSIMILE AND MAIL**Kate Padilla, Team Leader  
Bureau of Land Management  
Casper District Office  
1701 East E Street  
Casper, WY 82601Re: Final EIS for Cave Gulch,  
Bullfrog, Waltman

Dear Ms Padilla:

EPA has completed review of the Final EIS (FEIS) for the Cave Gulch, Bullfrog, Waltman Natural Gas Development Project published June 20, 1997. Our comments on the Draft EIS (DEIS) and Air Quality Technical Report were submitted March 31, 1997 and April 8, 1997, respectively. In general, most of EPA's comments have been addressed in a satisfactory manner. However, the manner of presentation of corrections and/or modifications caused difficulty in tracking comments with changes incorporated into the FEIS. In cases where the response to comment indicated a further reference to the "Addendum and Errata" Section, the information could not be located. EPA's particular concerns with responses to comments are addressed in the attached summary.

EPA maintains environmental concerns with the proposed implementation of this gas development project. We are particularly concerned with the protection of ground and surface water resources and plan to work closely with the BLM and other responsible State and Federal Agencies to ensure the adequacy of mitigation, monitoring and pollution preventions measures for this project.



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If you have any questions, please call me at (303) 312-6340, or the Project Review Coordinator, Mike Strieby, at (303) 312-6002.

Sincerely,

*Carol L. Campbell*

Carol L. Campbell, Director  
Ecosystem Protection Program  
Office of Ecosystem Protection &  
Remediation

Enclosure

cc: Mike Strieby, EPA  
Robert Edgar, EPA  
Rich Muza, EPA  
Kris Jensen, EPA  
Dave Ruiter, EPA  
Elaine Suriano, EPA, OFA



**COMMENTS ON FINAL EIS**  
**CAVE GULCH-BULLFROG-WALTMAN**  
**NATURAL GAS DEVELOPMENT PROJECT**

**RESPONSE TO INITIAL COMMENT LETTER**

- 1) Response 38-2, Section 3.2.2, #1. The first part of the response is correct. However, a review of Section 3.2.2 does not reference the Cave Gulch Air Quality Technical Support Document.
- 2) Response 38-2, Section 3.2.2, #4. This comment did not respond to the question of using the 95th percentile maximum 1-hour concentration in Moxa Arch and Fontenelle while only using the 90th percentile in the Cave Gulch EIS.
- 3) Response 38-2, Section 4.2.3, #7. EPA's comment was questioning the possible presence of ethylene glycol, a hazardous air pollutant. The response given does not address this chemical. But, the response instead addresses the presence of triethylene glycol, a close relative.
- 4) Response 38-2, Section 4.2.3, #8. The reference to "EPA, 1997", is not included in the published references for this EIS.
- 5) Response 38-2, Section 4.2.3, #9. The main point of EPA's comment was to establish that the predicted ISCST3 concentrations for HAPs are for 8-hour exposures whereas the "Range of State AACLs" listed in Table 4-1 have a nondesignated exposure time. This point is not addressed in the Final EIS Responses.
- 6) Response 38-2, Section 4.2.3, #10. A cited reference for "EPA, 1997" has not been included in the FEIS.
- 7) Response 38-3, 1st Paragraph. The response to EPA's comment on Section 1.5.1, Conformance with Land Use Plans is misleading. On page 1-11 of the DEIS, the Natrona Management Framework Plan (MFP) of March 15, 1980 is cited as the basis for NSO lease stipulations. The response avoid the statement in the DEIS and leaps to a citation of the Record of Decision (ROD) dated July, 1985. There needs to be an factual explanation of the change from the text in the DEIS to the apparent difference of the decision document. The reviewing public has not been presented with sufficient information to make a determination of the adequacy of response and the conformance of the FEIS to the existing Land Use Plans.
- 8) Response 38-3, 2nd Paragraph. This response is incorrect. The Environmental Protection Agency under Section 404 of the Clean Water Act has the responsibility to make determinations of "Waters of the U.S.". As a practical matter, the Corps of Engineers may make this kind of a determination. But, the determination is subject to EPA's oversight and concurrence.

9) Response 38-3, 8th Paragraph. EPA disagrees with this paragraph. The assumption of "successful mitigation" is questionable. Please contact Dave Ruiter at (303) 312-6794 to discuss this issue.

10) Response 38-4. EPA's concerns focus on the actual protection measure for Underground Sources of Drinking Water as defined in the Safe Drinking Water Act. EPA understands that the BLM's Onshore Oil and Gas Order No.2 contains directive for the protection of USDWs. As stated in the response, the actual implementation of this Order occurs when processing an Application for Permit to Drill (APD). The general public is not usually involve in the APD process. Without specific knowledge of the ground water in the project area, as requested in EPA's initial comments, how will the public be assured of the protectiveness of measures to be implemented? EPA requests that we receive formal notification of the processing of APDs in this project area and be given adequate opportunity for review and comment on the planned measures for protection of ground water.

#### **RESPONSE TO SUPPLEMENTAL LETTER**

1) Response 62-3, 1st Paragraph. EPA is concerned about the organic emissions from the high pressure three phase separators. BLM's response does not address this concern.

2) Response 62-3, #2. The corrections referenced are not in Section 2 of the Addendum and Errata.

3) Response 62-3, #7. The corrections referenced cannot be located in the FEIS Section 2 - Addendum and Errata.

4) Response 62-3, #8. The corrections to Table 5.6, third column, cannot be located in FEIS Section 2 - Addendum and Errata.

From: mike strieby  
To: DCAR01.DCARP01(YOUNG-PEARL,HENDERSON-MARILYN,SURIA...  
Date: //21/9/ 10:38am  
Subject: Final EIS for Cave Gulch

The following is the Summary Paragraph for the Cave Gulch EIS.

EPA has completed review of the F.EIS for Cave Gulch - Bullfrog - Waltman Natural Gas Development Project in Natrona County, Wyoming. A final comment letter was sent on July 18, 1997. In general, EPA's previous comments were addressed in a satisfactory manner. EPA maintains environmental concerns about the protectiveness of the proposed plans for ground water and surface water.

The unofficial rating for the F.EIS is "EC"

Mike Strieby  
(303) 312-6002

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